

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: )  
DELPHI CORPORATION, et al., ) Chapter 11  
Debtors. ) Case No. 05-44481 (RDD)  
Jointly Administered  
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**AFFIDAVIT OF TERRY IWASAKI IN SUPPORT OF RESPONSE OF METALDYNE  
CORPORATION AND METALDYNE SINTERED COMPONENTS, INC. TO  
DEBTORS' (I) THIRD OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11  
U.S.C. § 502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A) CLAIMS WITH  
INSUFFICIENT DOCUMENTATION, (B) CLAIMS UNSUBSTANTIATED BY  
DEBTORS' BOOKS AND RECORDS, AND (C) CLAIMS SUBJECT TO  
MODIFICATION AND (II) MOTION TO ESTIMATE CONTINGENT AND  
UNLIQUIDATED CLAIMS  
PURSUANT TO 11 U.S.C. § 502(c)**

STATE OF MICHIGAN )  
COUNTY OF WASHTENAW )ss  
)

Terry Iwasaki, being duly sworn, deposes and states as follows:

1. I am the Vice President of Finance, Commercial Operations and Metaldyne Asia, of Metaldyne Corporation and Metaldyne Sintered Components, Inc. (together, "Metaldyne"). Metaldyne is an automotive parts supplier that has provided in the past prior to these cases and continues to provide goods and services to the Debtors.

2. Except as otherwise indicated, all facts set forth in this Affidavit are based upon my personal knowledge, information and belief, information supplied to me by other employees of Metaldyne, or information learned from records kept in the ordinary course of business that were reviewed by me or other employees of Metaldyne. If called as a witness, I would testify competently to the matters set forth herein.

3. Delphi Automotive Systems LLC ("Delphi Automotive") and Metaldyne Company LLC and Metaldyne Sintered Components are parties to a Long Term Contract dated March 31, 2005, a copy of which is attached hereto as Attachment 1. Pursuant to the Long Term Contract, Metaldyne provided certain parts to Delphi Automotive (the "Parts").

4. Prior to the Debtors' bankruptcy filing on October 8, 2005 (the "Petition Date"), Metaldyne was not paid in full for its invoices for certain Parts, as shown in Attachment 2 and Attachment 3 hereto. Specifically, Metaldyne was not paid and is owed as of the Petition Date \$11,310.89 for invoices described in Attachment 2 hereto and \$415,470.68 for invoices described in Attachment 3 hereto. The amount of each invoice, the amount paid, if applicable, and the amount due, is reflected on the respective Attachments. Copies of the invoices are attached to the respective Attachments.

5. On or around July 28, 2006, Metaldyne filed a proof of claim in these cases covering the claims described herein, which proof of claim contains additional support and documentation underlying Metaldyne's claims.

FURTHER AFFIANT SAYETH NOT.

Terry Iwasaki 11/21/06  
TERRY IWASAKI

Subscribed and sworn to before me  
This 21 day of November, 2006.

Bonita L. Nish  
NOTARY PUBLIC  
My Commission Expires: 6-15-2011

